

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2023-9-E**

IN RE:)	
Dominion Energy South Carolina,)	PETITION
Incorporated's 2023 Integrated Resource Plan)	TO INTERVENE OF CAROLINAS
(IRP))	CLEAN ENERGY BUSINESS
)	ASSOCIATION
)	(Out of Time)

INTRODUCTION

This Docket was opened on January 18, 2022, for the Commission’s required review every three-years, of Dominion Energy South Carolina, Inc., (“DESC”), integrated resource plan (“IRP”).

Petitioner herein is the Carolinas Clean Energy Business Association, (hereinafter as “CCEBA” or “Petitioner”). This Petition to Intervene (Out of Time), is filed pursuant to R. 103-825, of this Commission’s Rules and Regulations and other applicable Rules and Regulations of this Commission, and Petitioner seeks permission to intervene and be made a party of record in the above-referenced Docket, with full rights of participation.

PETITIONER

Carolinas Clean Energy Business Association.

1. CCEBA is a Mutual Benefit Corporation, incorporated in the State of North Carolina and domesticated to conduct business in the State of South Carolina by the South Carolina Secretary of State’s office.

2. CCEBA is organized for the purpose of promoting and advocating public policy positions supportive of renewable power generation in North and South Carolina. CCEBA is a 501(c)(6) organization representing all types of businesses in the clean energy sector, including developers, manufacturing, engineering, construction, professional and financial services, and non-energy businesses wishing to purchase clean energy. With over 50 members, including most of the utility-scale solar developers in North and South Carolina, CCEBA monitors and participates in energy policymaking in both Carolinas. CCEBA has appeared as an intervenor in multiple dockets in North Carolina under its prior name: North Carolina Clean Energy Business Alliance. In South Carolina, CCEBA assumed the role previously filled by the South Carolina Solar Business Alliance (“SCSBA”).

3. By way of background, CCEBA was substituted as a Party in Interest in over two dozen Dockets of this Commission, by Commission Order No. 2021-167, dated March 10, 2021. This Commission has also subsequently approved CCEBA's intervention, *inter alia*, in Dockets 2021-88-E, 2021-89-E, 2021-90-E, 2021-93-E, 2021-192-E, 2021-9-E, 2021-114-E, 2022-238-E, 2022-239-E, 2022-240-E, 2023-38-E, 2023-39-E, 2023-15-E, 2023-16-E and 2023-17-E.

4. Petitioner's interests cannot be adequately addressed by any other party.

5. CCEBA acknowledges that this Commission established a procedural schedule for this proceeding and that the time for intervention has passed. CCEBA only maintains a small administrative staff and CCEBA's intervention was also delayed because of the press of the numerous other Commission Dockets in which CCEBA is currently participating. CCEBA is implementing process changes to avoid such filings in future dockets. including establishing a matrix of Commission dockets and deadlines of interest, which will be reviewed on a weekly basis.

6. CCEBA's Intervention (Out of Time) will not prejudice any party. Specifically, CCEBA will accept the Record of this proceeding as the Record stands on the date of CCEBA's approval for intervention, if granted by this Commission. CCEBA's Intervention (Out of Time), will not disrupt the proceeding, nor prejudice or impose additional burdens on any other parties in this Docket.

7. CCEBA's participation will constructively add to this proceeding by contributing to the development of a complete record based on the unique and substantial business interests of CCEBA's Members and CCEBA's broad and current participation in Commission Dockets.

8. Petitioner's grounds are that Petitioner's Members' economic interests will be directly and substantially affected by the outcome of this proceeding and Petitioner's Members' business interests will be directly and financially impacted by this Commission's resolution of the subject matter of this Docket.

9. Based on the foregoing, CCEBA has shown that good cause exists to allow CCEBA to intervene out of time and CCEBA respectfully requests it be allowed to intervene (Out of Time) with full rights of participation in this Docket.

10. The granting of this Petition to Intervene (Out of Time) is (i) in the public interest and (ii) consistent with the policies of this Commission in encouraging maximum public participation in issues before it and (iii) with good cause having been shown, intervention should be allowed.

11. Petitioner is represented by counsel in this proceeding:

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WHEREFORE, Petitioner prays for the following relief:

- (a) That this Petition to Intervene, (Out of Time) be accepted and that Petitioner be made a party of Record;
- (b) That Petitioner be allowed to participate fully in this proceeding and take such positions as it deems advisable; and
- (c) For such other and further relief as this Commission may deem just and proper.

Respectfully Submitted,

/s/Richard L. Whitt

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*As Counsel for Petitioner, the Carolinas Clean
Energy Business Association.*

June 2, 2023